REMARKS/ARGUMENTS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1-17 are presently pending in this case. Claims 1, 12, and 13 are amended and new Claims 16 and 17 are added by the present amendment. As amended Claims 1, 12, and 13 and new Claims 16 and 17 are supported by the original disclosure,[1] no new matter is added.

In the outstanding Official Action, Claims 1, 3, 5, 10, 12, 14, and 15 were rejected under 35 U.S.C. §103(a) as unpatentable over Alsop et al. (U.S. Patent Application Publication No. 20030077561, hereinafter "Alsop") in view of Sakuragi (U.S. Patent No. 5,204,959); and Claims 2-4, 6-9, 11, and 13 were rejected under 35 U.S.C. §103(a) as unpatentable over Alsop in view of Sakuragi and further in view of Tanio (U.S. Patent No. 5,930,389).

With regard to the rejection of Claims 1 and 12 as unpatentable over Alsop in view of Sakuragi, that rejection is respectfully traversed.

Amended Claim 1 recites in part:

> an image data converting hardware unit configured to convert a format of image data from a first format to a second format, said first format and said second format each being one of NFC1, K4, K8, JPEG, RJ2K, a four-value format, a binary format, an eight-value format, and an MH/MR/MMR format, said image data converting unit further configured to resize the image data by increasing or decreasing the linear dimensions of the image;
>   a format unifying unit configured to unify a plurality of formats of image data by utilizing said image data converting unit; and
>   *a controller configured to control the image data converting hardware unit and the format unifying unit, the controller configured to create a first thread and a second thread, the first thread configured to control conversion of first image data by the image data converting hardware unit*

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[1] See, e.g., the specification at page 31, line 25 to page 33, line 16 and Figures 1, 3, and 14.

> *and the format unifying unit, and the second thread*
> *configured to control conversion of second image data by the*
> *image data converting hardware unit and the format unifying*
> *unit.*

Alsop describes a Web server 100 for printable whiteboards. The outstanding Office Action cited meeting site 100 of Alsop as including "an image data converting unit" and "a format unifying unit" as previously cited in Claim 1.[2] However, it is respectfully submitted that Alsop does not describe that meeting site 100 includes any controller configured to create a first and a second thread, much less a first thread configured to control conversion of first image data by the image data converting hardware unit and the format unifying unit, and a second thread configured to control conversion of second image data by the image data converting hardware unit and the format unifying unit. Further, it is respectfully submitted that Sakuragi also does not describe such a controller. Thus, the proposed combination does teach or suggest "a controller" as defined in amended Claim 1. Consequently, Claim 1 (and Claims 2-11, and 14-17 dependent therefrom) is patentable over Alsop in view of Sakuragi.

Amended Claim 12 recites in part:

> *generating a first thread configured to control*
> *conversion of first image data;*
> *generating a second thread configured to control*
> *conversion of second image data;*
> unifying a plurality of formats of the first and second
> image data to a single format by converting the formats of the
> first and second image data by hardware *under control of the*
> *first and second threads, respectively*, said single format being
> one of NFC1, K4, K8, JPEG, RJ2K, a four-value format, a
> binary format, an eight-value format, and an MH/MR/MMR
> format;
> resizing the first image data by increasing or decreasing
> the linear dimensions of the image *under control of the first*
> *thread*;
> resizing the second image data by increasing or
> decreasing the linear dimensions of the image *under control of*
> *the second thread*; and
> consolidating and printing the first and second image
> data whose formats are unified.

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[2]See the outstanding Office Action at pages 3-4.

As noted above, neither <u>Alsop</u> nor <u>Sakuragi</u> describe of a first thread and a second thread. Thus, it is respectfully submitted that the proposed combination of <u>Alsop</u> and <u>Sakuragi</u> does not teach "generating a first thread," "generating a second thread," "unifying a plurality of formats of the first and second image data," "resizing first image data," and "resizing the second image data" as defined in amended Claim 12. Consequently, Claim 12 is also patentable over <u>Alsop</u> in view of <u>Sakuragi</u>.

With regard to the rejection of Claims 13 as unpatentable over <u>Alsop</u> in view of <u>Sakuragi</u> and further in view of <u>Tanio</u>, that rejection is respectfully traversed.

Amended Claim 13 recites in part:

> a controller configured to control the plurality of image data converting hardware units and the format unifying unit, the controller configured to create a first thread and a second thread, the first thread configured to control conversion of first image data and the second thread configured to control conversion of second image data.

As noted above, neither <u>Alsop</u> nor <u>Sakuragi</u> teach or suggest a controller configured to create a first thread and a second thread, and it is respectfully submitted that <u>Tanio</u> does not describe any such controller either. Thus, it is respectfully submitted that the proposed combination does not teach or suggest "a controller" as defined in amended Claim 13. Consequently, Claim 13 is also patentable over <u>Alsop</u> in view of <u>Sakuragi</u> and further in view of <u>Tanio</u>.

Finally, new Claims 16 and 17 are supported at least by the specification at page 31, line 25 to page 33, line 16. As new Claims 16 and 17 are dependent from Claim 1, new Claims 16 and 17 are patentable for at least the reasons described above with respect to this claim. In addition, new Claims 16 and 17 recite subject matter that is not taught or suggested by <u>Alsop</u>, <u>Sakuragi</u>, or <u>Tanio</u>. Consequently, new Claims 16 and 17 further define over <u>Alsop</u> in view of <u>Sakuragi</u> and further in view of <u>Tanio</u>.
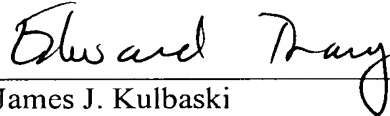
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Accordingly, the pending claims are believed to be in condition for formal allowance.

An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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